

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20275-MARTINEZ

UNITED STATES OF AMERICA

vs.

LAVON MOSS JR.,

Defendant.

FACTUAL PROFFER

The United States of America, Lavon Moss Jr., and his undersigned counsel agree that, had this case proceeded to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

On or about January 10, 2022, law enforcement executed a search warrant signed by a judge in the Eleventh Judicial Circuit in Miami Dade County at Moss's residence where he was present with his mother and a male.

When law enforcement searched Moss's room, they located, among other things, a red notebook on a desk. The red notebook belonged to Moss and contained his fingerprints on the inside pages. The notebook contained approximately fifty (50) personal identifying information ("PII") of other individuals in the form of their names, social security numbers, dates of birth, and addresses. The victims are real individuals and did not give Moss permission to possess their information.

Moss was interviewed by law enforcement and admitted to possessing other individuals' PII in a recorded post-*Miranda* statement.


The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the undersigned defendant's knowing, willful, and intentional plea of guilty.

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


Date: 12/5/22

By: 
YARA DODIN
ASSISTANT UNITED STATES ATTORNEY

Date: 12/5/22

By: 
AIMEE FERRER
ATTORNEY FOR DEFENDANT

Date: 12/5/22

By: 
LAVON MOSS JR.
DEFENDANT